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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MONICA SANTANA AND PAULA  
KLEYNBURD, on behalf of themselves and all  
others similarly situated,

*Plaintiffs,*

v.

23ANDME, INC.,

*Defendant.*

CASE NO. 3:23-cv-05147-EMC

Hon. Edward M. Chen

**STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE DEADLINE TO RESPOND  
TO COMPLAINT UNTIL AFTER CASE  
MANAGEMENT CONFERENCE**

23andMe, Inc. (“Defendant”) and Plaintiffs Monica Santana and Paula Kleynburd (“Plaintiffs”) (collectively the “Parties”), jointly stipulate, with the Court’s permission, to continue Defendant’s deadline to respond to the complaint to thirty (30) days after the Initial Case Management Conference is held.

The Parties, by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed the Complaint on October 9, 2023;

WHEREAS, Plaintiffs served the Summons and Complaint on Defendant on October 13, 2023;

WHEREAS, Defendant’s initial deadline to respond under the Federal Rules of Civil Procedure was November 3, 2023;

WHEREAS, the Parties stipulated and agreed on November 3, 2023 that Defendant may have an extension of time, until and including January 2, 2024, to respond to Plaintiffs’ Complaint pursuant to Northern District of California Local Rule 6-1(a);

WHEREAS, on December 21, 2023, Defendant filed a Motion to Transfer Actions to the Northern District of California Pursuant to 18 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings with the JPML, styled *In re: 23andMe, Inc. Litigation*, MDL No. 3098 (the “MDL Motion”);

WHEREAS, on December 29, 2023, Defendant requested this Court enter a stay of all proceedings until the JPML rules on Defendant’s MDL Motion (the “Motion to Stay”) and filed a Re-Notice of the Motion to Stay to correct the briefing schedule on January 5, 2024;

WHEREAS, the Parties stipulated and agreed on January 2, 2024 that Defendant may have an extension of time, until and including February 1, 2024, to respond to Plaintiffs’ Complaint;

WHEREAS, on January 17, 2023 the Court vacated the Initial Case Management Conference set for January 23, 2024 and ordered the Initial Case Management Conference be reset to 30 days after the Court rules on Defendant's filed Motion to Stay.

WHEREAS, on January 26, 2024, the Parties agreed to continue Defendant’s deadline to respond to the complaint to 30 days after the Initial Case Management Conference;

WHEREAS, the proposed extension will not alter the date for any hearing or deadline set by the Court.

1 For the reasons stated above, IT IS HEREBY STIPULATED AND AGREED between the parties  
2 by and through their counsel of record, and with the Court's permission, that Defendant's deadline to  
3 respond to the complaint be continued to 30 days after the Initial Case Management Conference is held,  
4 per Civil L.R. 7-12.

5 By her signature below, counsel for Defendant, Rebekah S. Guyon, declares that the foregoing  
6 statements are true and correct under Civil L.R. 6-2(a).

7  
8 DATED: January 29, 2024

GREENBERG TRAURIG, LLP

9  
10 By: /s/Rebekah S. Guyon  
11 Rebekah S. Guyon  
Attorneys for Defendant, 23andMe, Inc.

12 DATED: January 29, 2024

EDELSBERG LAW, PA

13  
14 By: /s/Scott A. Edelsberg  
15 Scott A. Edelsberg  
16 Attorneys for Plaintiff and Proposed Class

17 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3):**

18 I, Rebekah S. Guyon, counsel for Defendant, attest that all Signatories have concurred in the  
19 filing of the document.

20 DATED: January 29, 2024

GREENBERG TRAURIG, LLP

21  
22 By: /s/Rebekah S. Guyon  
23 Rebekah S. Guyon  
24 Attorneys for Defendant, 23andMe, Inc.

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, and for good cause shown, IT IS ORDERED THAT that Defendant's deadline to respond to the complaint is continued to 30 days after the Initial Case Management Conference is held in this matter.

DATED: this \_\_\_ day of January 2024

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Hon. Edward M. Chen  
United States District Court Judge